

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: )  
LIGADO NETWORKS LLC, *et al.*<sup>1</sup> ) Chapter 11  
Debtors. ) Case No. 25-10006 (TMH)  
              ) (Jointly Administered)  
              )  
              )

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**THIRD SUPPLEMENTAL DECLARATION OF JOHN M. CONLON IN SUPPORT OF  
DEBTORS' APPLICATION FOR AN ORDER AUTHORIZING THE RETENTION AND  
EMPLOYMENT OF MAYER BROWN LLP AS SPECIAL COUNSEL FOR THE  
DEBTORS AND DEBTORS IN POSSESSION AS OF THE PETITION DATE**

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John M. Conlon makes this declaration under 28 U.S.C. § 1746:

1. I am a partner in the law firm of Mayer Brown LLP ("Mayer Brown" or the "Firm"), a law firm with offices located at, among other places, 1221 6<sup>th</sup> Avenue, New York, NY 10020. I am one of the lead attorneys from Mayer Brown working on the litigation of claims and causes of action against Inmarsat Global Limited on behalf of the Debtors. I am a member in good standing of the Bar of the State of New York, and I am admitted to practice in the Supreme Court of the United States of America, among other courts. There are no disciplinary proceedings pending against me in any jurisdiction.

2. I submit this third supplemental declaration in support of the *Debtors' Application for an Order Authorizing the Retention and Employment of Mayer Brown LLP, as Special Counsel for the Debtors and Debtors in Possession as of the Petition Date* [Dkt. No. 181]

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors' headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

(the “Application”).<sup>2</sup> Except as otherwise noted in this declaration, I have personal knowledge of all matters set forth herein.

3. Unless otherwise indicated, all facts set forth in this Supplemental Declaration are based on my personal knowledge, other partners and professionals of Mayer Brown, my review of relevant documents, or my opinion based upon my experience, knowledge, and information concerning the matters set forth herein. If I were called to testify, I would testify competently to the facts set forth below.

4. The purpose of this Supplemental Declaration is to provide disclosure regarding Mayer Brown’s connections to one of the Potential Parties in Interest that was included on Schedule 1 to the Application when it was filed. Specifically, included in the list of First Lien Noteholders on Schedule 1 is Bardin Hill Investment Partners, L.P., f/k/a Halcyon Structured Asset Management L.P. (“Bardin Hill”). When Schedule 2 to the Application disclosing any client connections that Mayer Brown has to the Potential Parties in Interest was filed, Bardin Hill was not a current or former client of Mayer Brown. Recently, however, Mayer Brown was retained to represent Bardin Hill on a matter entirely unrelated to the Debtors or these Chapter 11 Cases. Accordingly, by this Supplemental Declaration, Schedule 2 is amended to reflect the following new disclosure:

| <b>Party Name</b>  | <b>Relationship to Debtors</b> | <b>Relationship to Mayer Brown</b>  |
|--|--------------------------------|---|
| Bardin Hill Investment Partners, L.P. (f/k/a Halcyon Structured Asset Management L.P.) | First Lien Noteholder          | Current client on a matter unrelated to the Debtors or these Chapter 11 Cases |

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<sup>2</sup> Capitalized terms used, but not otherwise defined herein, have the meanings ascribed to them in the Application.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 5, 2025

/s/ John M. Conlon

John M. Conlon  
Partner  
Mayer Brown LLP